

Information to identify the case:

Debtor 1 Angel M. Prada

Debtor 2 Karlana Prada

U.S. Bankruptcy Court for the Eastern District of Pennsylvania

Case Number 22-12673-pmm Chapter 13

☐ Check if this is an amended filing

Application for Compensation and Reimbursement of Expenses

The Applicant below is filing this application with the court for payment of fees and expenses in association with this bankruptcy case.

Part 1 Notice

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case (if you do not have an attorney, you may wish to consult one).

If you do not want the court to grant this Application, you or your attorney must file an objection to the Application on or before the Objection Deadline. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically. Otherwise, you must file your objection at the Clerk's office at the U.S. Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107.

If you mail your objection to the Clerk, you must do so early enough that it will be received on or before the Objection Deadline. If you or your attorney do not take these steps, the court may decide that you do not oppose the application and may enter an order granting the Application without further notice or hearing.

Objection Deadline: May 21, 2024

Part 2 Applicant and Application Information

Applicant: Michael I. Assad (#330937)

Applicant Firm: Cibik Law, P.C.

Applicant's Email: help@cibiklaw.com

Applicant's Phone: 215-735-1060

Applicant's Address: 1500 Walnut Street, Suite 900

Philadelphia, PA 19102

Applicant Type: Attorney for Debtors

Application Period: 09/15/2022 to 07/05/2024

Basis of Application: 11 U.S.C. § 330; In re Lewis

Application Type: First

Form 2030: Exhibit A

Part 3 Case Information

Date Filed: October 4, 2022

U.S. Bankruptcy Judge: Patricia M. Mayer

Standing Trustee: Kenneth E. West

Debtor's Median Income: Below Median

Part 4 Summary of Services Performed

1. This is the first fee application in this case.
2. This case was dismissed for unreasonable delay and failure to make plan payments on April 23, 2024.
3. The Applicant seeks approval of fees in connection with the customary services of filing a chapter 13 case and guiding the plan to confirmation.
4. In addition to customary services, the Applicant also represented the Debtors in a motion to extend the automatic stay and defended the Debtors against two motions for relief from the automatic stay.
5. The services performed were of substantial benefit to the bankruptcy estate.
6. The Debtors' past-due payments on a residential lease prevented confirmation of the plan, which gave rise to dismissal of the case. Were it not for those past-due payments, the plan would have been confirmed.

Part 5 Flat Fees Incurred

By prior agreement with the Debtor, the Applicant requests payment of flat fees for each of the following services:

Date	Description	Fee
	NONE	
TOTAL		

Part 6 Hourly Fees Incurred

The Applicant requests payment based on actual time expended for the following services:

Date	Description	Hours Expended
9/15/22	(Attorney) Initial consultation - discussed refiling bankruptcy, answered questions, provided advice.	1
10/4/22	(Attorney) Drafted petition, schedules, statements, and other documents.	3.5
10/4/22	(Attorney) Drafted chapter 13 plan	0.5
10/4/22	(Attorney) Drafted creditor matrix	0.5

Date	Description	Hours Expended
10/4/22	(Attorney) Drafted motion to pay trustee	0.1
10/4/22	(Attorney) Drafted motion to extend automatic stay	0.4
10/4/22	(Paralegal) Filed petition, schedules, plan, and other documents with the court using the CM/ECF system. Served chapter 13 plan.	1.5
11/2/22	(Paralegal) Prepared for meeting of creditors by gathering income and other documents from client and uploading them to trustee portal after redacting personal information	2
11/30/22	(Attorney) Represented debtors at meeting of creditors	0.5
12/27/22	(Attorney) Reviewed motion for relief from automatic stay filed by UMH Properties	0.1
1/4/23	(Attorney) Reviewed motion to dismiss filed by chapter 13 trustee	0.1
1/12/23	(Attorney) Reviewed objection to plan filed by UMH PA Valley View-Danboro	0.1
1/13/23	(Attorney) Reviewed motion for relief from automatic stay filed by UMH PA Valley View-Danboro	0.1
1/15/23	(Attorney) Drafted response to motion for relief from automatic stay filed by UMH Properties	0.3
1/15/23	(Attorney) Drafted response to motion for relief from automatic stay filed by UMH PA Valley View-Danboro	0.3
2/21/23	(Attorney) Represented debtors at hearing on motion for relief from automatic stay filed by UMH PA Valley View-Danboro	0.5
3/8/23	(Attorney) Reviewed proofs of claim	0.8
3/8/23	(Attorney) Drafted first amended chapter 13 plan	0.5
3/8/23	(Attorney) Drafted amended Schedule J	0.1
3/10/23	(Attorney) Negotiated settlement to motion for relief from stay filed by UMH Properties	2
3/10/23	(Attorney) Negotiated settlement to motion for relief from stay filed by UMH PA Valley View-Danboro	1
3/10/23	(Attorney) Drafted second amended chapter 13 plan	0.3
3/10/23	(Attorney) Drafted amended Schedule J	0.1
5/24/23	(Attorney) Reviewed motion to dismiss filed by chapter 13 trustee	0.1
7/7/23	(Attorney) Drafted third amended chapter 13 plan	0.4
7/7/23	(Attorney) Drafted amended Schedule J	0.1

Date	Description	Hours Expended
7/7/23	(Attorney) Drafted response to trustee's motion to dismiss.	0.2
9/8/23	(Attorney) Drafted fourth amended chapter 13 plan	0.4
10/23/23	(Attorney) Drafted fifth amended chapter 13 plan	0.1
12/10/23	(Attorney) Drafted amended Schedule J	0.6
1/9/24	(Attorney) Represented debtors at confirmation hearing	0.1
2/27/24	(Attorney) Represented debtors at confirmation hearing	0.3
4/23/24	(Attorney) Represented debtors at hearing on motion to dismiss.	0.1
5/7/24	(Attorney) Reviewed time slips and drafted fee application	0.5
Total Attorney Fees (\$305.00 per hour)		\$5,063.00 (16.60)
Total Paralegal Fees (\$125 per hour)		\$437.00 (3.50)

Part 7 Expenses

The Applicant requests reimbursement for the following expenses:

Date	Description	Fee
	NONE	
TOTAL		

Part 8 Summary of Fees and Expenses

Period		Requested		Allowed		Paid	
Start	End	Fees	Expenses	Fees	Expenses	Fees	Expenses
Pre-Petition						\$1,050.00	\$0.00
This Application		\$5,500.00	\$0.00				
TOTALS		\$5,500.00	\$0.00	\$ 0.00	\$ 0.00	\$1,050.00	\$0.00

Part 9 Other Information

1. None of the compensation paid to the Applicant will be shared with any person other than a member or regular associate of the Applicant's law firm unless 11 U.S.C. §504(c) applies.
2. The Applicant does not consent to the entry of a reduced award by the Court without notice and hearing.

Part 10 Request for Relief

The Applicant requests that the Court enter an award of \$5,500.00 in compensation and of \$0.00 in reimbursement of actual, necessary expenses.



Signature of Applicant

May 7, 2024

Date